

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>Plaintiff,</b>	:	<b>CASE NO. 2:20-MJ-288</b>
	:	<b>MAGISTRATE JUDGE JOLSON</b>
<b>v.</b>	:	
	:	
<b>LEATHA INEZ SAVAGE,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION FOR EXTENSION OF TIME DURING WHICH  
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and jointly move this Court for an order extending the time for the return of an Indictment or Information pursuant to 18 U.S.C. § 3161(b), for sixty (60) days from **Tuesday, February 16, 2021**, until **Monday, April 19, 2021**. The defendant, Leatha Inez Savage, is aware of her right to a timely filing of an Indictment or Information afforded under 18 U.S.C. § 3161(b) and hereby waives that right for the purposes of this motion.

The parties believe this continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The United States and defense counsel are in continued discussions and need additional time to resolve this case or proceed to Grand Jury. Due to the COVID-19 pandemic, it has been difficult for defense counsel to effectively communicate and meet with his client. The parties are in agreement that a continuance of the time to file an Indictment or Information would best serve the interests of justice, and that the time period from **Tuesday, February 16, 2021, to Monday, April 19, 2021**, would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

For these reasons, the parties request an extension of the time of 60 days within which to file Indictment or Information in this case. The new date requested is **Monday, April 19, 2021**.

Respectfully submitted,

DAVID M. DEVILLERS  
United States Attorney

s/Samuel Shamansky

per telephone authority  
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